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December 13, 2011

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Applications of AT&T Mobility Spectrum LLC and Qualcomm  
Incorporated for Consent to the Assignment of Licenses,*  
WT Docket No. 11-18

**NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch,

On Monday, December 12, 2011, I spoke with Rick Kaplan, Chief of the Wireless Bureau, and Renata Hesse, Chief Transaction Counsel. We discussed the unique interference and other challenges faced by carriers seeking to develop 4G service in the 700 MHz blocks, particularly the A block. More specifically, we discussed the significant challenges associated with attempting to manage and mitigate the interference from the Channel 51 broadcasters, particularly in urban areas, and any high power Lower E block broadcasts. As has been discussed in detail in the pending rulemaking on this issue, the interference challenges into the A block are significant, despite recent studies that suggest they are not.

To address these issues and reduce the interference challenges, I explained that the Commission would need to prohibit extremely high power broadcasts by DTV stations on Channel 51 in order to eliminate interference of such broadcasts into A block base stations and Band 12 device interference into television receivers operating on Channel 51. Also, to eliminate interference resulting from high power transmissions on the Lower E block, the Commission would need to adopt service rules -- similar to those for the Lower A and B blocks -- that impose lower power and antenna height requirements, and govern co-location, interference coordination, and downlink-only operations.

If such rule modifications were enacted, and the A Block were largely relieved of the interference concerns that prompted the creation of Band 17 in the standards setting process, AT&T would not rule out a migration to Band 12 in the future. AT&T should remain free, however, to plan and manage any such migration in a way that would not disrupt existing service or result in unnecessary cost or delay.

In accordance with Commission rules, this letter is being filed electronically with your office for inclusion in the public record.

Sincerely,

A handwritten signature in black ink, appearing to be 'JM' followed by a long horizontal line.

Joan Marsh

cc: Rick Kaplan, Esq.  
Renata Hesse, Esq.  
Best Copy and Printing, Inc.  
Kathy Harris, Esq.  
Ms. Kate Matraves  
Jim Bird, Esq.